

David H. Relkin

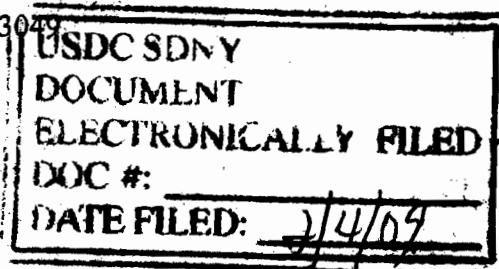
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January 26, 2009



BY FAX

Judge Barbara S. Jones
United States District Court
500 Pearl Street--Room 610
New York, New York 10007

Re: Leslie Dick Worldwide, Ltd. et al. v. George Soros, et al.;
Case No. 08 Civ. 7900 (BSJ) (THK) ECF

Dear Judge Jones:

I am counsel for plaintiffs in this action. I am in receipt of Rule 11 safe harbor letters from Cerberus and Kirkland & Ellis. In light of some of the issues raised by these defendants and the other defendants' motions to dismiss, and to avoid the continuation of unnecessary motion practice or burden on this Court's time, we have decided to amend the complaint within the time in which the scheduling order provides for our response to the motions to dismiss.

By that time, any alleged deficiencies in the Complaint will be addressed, and defendants can answer or make any other appropriate motions with respect to the Amended Complaint. Accordingly, we take the position that the Cerberus and Kirkland & Ellis motions would be moot since they are not directed to the Amended Complaint.

While I have suggested to Cerberus and Kirkland & Ellis that any safe harbor letters should be directed to the amended complaint and not a complaint which is being superseded, both take a contrary position.

To avoid any unnecessary motion practice, however, while I believe that the Cerberus and Kirkland & Ellis motions are now moot, I am respectfully requesting that you extend the time of the safe harbor period for Cerberus and Kirkland & Ellis to March 20, 2009, when the Amended Complaint will be served. There is no prejudice to Cerberus or Kirkland & Ellis in granting this request since the present complaint will be no longer operative and Cerberus and Kirkland & Ellis will not incur any further counsel fees until the Amended Complaint is served.

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Upon service of the Amended Complaint, if defendants continue to seek to dismiss the complaint, we will of course enter into a briefing schedule granting defendants any reasonable amount of time for them to respond.

If you have any questions, or would desire further comment, we will be happy to respond.

Respectfully submitted,



David H. Reikin

DHR\mw
cc: David K. Momborquette, Esq.
(via email)
S. Maja Fabula, Esq.
(via email)
Mr. Leslie Dick
(via email)

As Plaintiffs have expressed their intent to withdraw the Complaint in this action and to file an Amended Complaint, the Court, in its discretion, will extend to Rule 11 "safe harbor" period to February 23, 2009, by which time the Amended Complaint shall be filed.

SO ORDERED

2/4/09



THEODORE H. KATZ
UNITED STATES MAGISTRATE JUDGE